

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

BENJAMIN CRAIG, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST III, and
STEWART EWING JR.,

Defendants.

Case No. 3:17-cv-01005-RGJ-JPM

DON J. SCOTT, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST III, R.
STEWART EWING JR., and DAVID D. COLE

Defendants.

Case No. 3:17-cv-01033-RGJ-JPM

**MOTION OF THE DETROIT INSTITUTIONAL INVESTOR GROUP FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND
APPROVAL OF SELECTION OF COUNSEL**

Proposed Lead Plaintiff Police and Fire Retirement System of the City of Detroit (“Detroit P&F”) and Laborers Pension Trust Fund – Detroit and Vicinity (“Detroit Laborers”) (collectively, the “Detroit Institutional Investor Group”), respectfully moves this Court pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (i) consolidating the above-captioned actions (“Related Actions”) pursuant to Rule 42(a) of the Federal Rules of Civil Procedure (“FRCP”); (ii) appointing the Detroit Institutional Investor Group as Lead Plaintiff for the Class of all persons or entities who purchased or otherwise acquired the securities of CenturyLink, Inc. (“CenturyLink” or the “Company”) between March 1, 2013 and June 19, 2017, inclusive (the “Class Period”); (iii) approving the Detroit Institutional Investor Group’s selection of the law firms of Labaton Sucharow LLP (“Labaton Sucharow”) and Kirby McInerney LLP (“Kirby McInerney”) as Co-Lead Counsel and Fishman Haygood L.L.P. (“Fishman Haygood”) as Liaison Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

This Motion is made on the grounds that the Detroit Institutional Investor Group is the “most adequate plaintiff” under the PSLRA and should therefore be appointed Lead Plaintiff. The Detroit Institutional Investor Group believes it has the “largest financial interest” in the relief sought by the Class in the Related Actions. The Detroit Institutional Investor Group also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other Class members’ claims, and because the Detroit Institutional Investor Group will fairly and adequately represent the Class. Further, the Detroit Institutional Investor Group is the paradigmatic Lead Plaintiff envisioned by Congress in enacting the

PSLRA because both members are sophisticated institutional investors with a substantial financial stake in the litigation that will provide effective monitoring and supervision of counsel.

In support of this motion, the Detroit Institutional Investor Group has filed concurrently herewith a memorandum of law, the Declaration of Local Counsel in Support of the Detroit Institutional Investor Group's Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel (the "Burge Decl."), and the Joint Declaration of the Detroit Institutional Investor Group's Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel, filed herewith as Exhibit C to the Burge Declaration. The Detroit Institutional Investor Group also bases its motion on the pleadings and other files and records in the Related Actions and such other written and/or oral argument as may be presented to the Court.

WHEREFORE, the Detroit Institutional Investor Group respectfully requests that the Court: (i) consolidate the Related Actions; (ii) appoint the Detroit Institutional Investor Group as Lead Plaintiff; (iii) approve the Detroit Institutional Investor Group's selection of the law firms of Labaton Sucharow and Kirby McInerney as Co-Lead Counsel and Fishman Haygood as Liaison Counsel for the Class; and (iv) grant such other and further relief as the Court may deem just and proper.

DATED: August 21, 2017

Respectfully submitted,

/s/ Jason W. Burge

Jason W. Burge

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Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2017, a copy of the foregoing Motion of the Detroit Institutional Investor Group for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Counsel was filed electronically and notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system. Parties may access this filing through the court's CM/ECF System.

/s/ Jason W. Burge

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